

EXHIBIT A

Proposed Order

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re)
)
) Chapter 11

MOTORS LIQUIDATION COMPANY, *et al.*,)
f/k/a General Motors Corp., *et al.*)

Debtors.)
_____))

**ORDER GRANTING RELIEF FROM AUTOMATIC STAY PURSUANT
TO SECTION 362(d)(1) OF THE BANKRUPTCY CODE**

Upon the *Motion of David Irwin for Relief From the Automatic Stay To Conduct Limited Intrusive Testing of Debtors' Property* (the "Motion") requesting relief from the automatic stay, all as more fully described in the Motion; and the Court having jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334 and the *Standing Order M-61 Referring to Bankruptcy Judges for the Southern District of New York Any and All Proceedings Under Title 11*, dated July 10, 1984 (Ward, Acting C.J.); and consideration of the Motion being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that notice of the Motion is sufficient under the circumstances; and the Court having held a hearing (the "Hearing") on April 26, 2011 to consider the Motion; and based upon the Motion and the record of the Hearing, and all of the proceedings before the Court; and good cause appearing therefor, it is hereby

ORDERED that the automatic stay under section 362 of the Bankruptcy Code is modified and lifted so as to (i) permit Irwin, M&M Auto, their respective insurers, and any of their designated agents (collectively the "Testing Parties") access to the Vehicle to conduct the Testing; and (ii) requiring Front Range Automotive, the Debtors, or any other party in possession of the Vehicle to make the vehicle available to the Testing Parties to perform the Testing; and it is

further

ORDERED that the fourteen-day stay of this Order pursuant to Federal Rule of Bankruptcy Procedure 4001(a)(3) is hereby waived, and this Order is deemed effective as of the date hereof; and it is further

Dated: New York, New York
_____, 2011

THE HONORABLE ROBERT E. GERBER
UNITED STATES BANKRUPTCY JUDGE